

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
                                )  
v.                            )       No. 20 CR 558  
                                )  
SARGON AUDISHO            )       Judge John F. Kness

**DEFENDANT SARGON AUDISHO'S UNOPPOSED MOTION  
TO MODIFY BOND CONDITIONS TO PERMIT TRAVEL FOR WORK**

Defendant SARGON AUDISHO, by and through his attorneys, THEODORE T. Poulos and ERIC S. PRUITT of COTSIRILOS, TIGHE, STREICKER, Poulos & Campbell, LTD., hereby respectfully requests that the Court enter an order modifying the conditions of Mr. Audisho's bond to permit him to travel to the Central District of Illinois in connection with his current employment. In support of this motion, Defendant state as follows:

1. On September 10, 2020, the Court released Mr. Audisho on an unsecured bond. (Dkt #14). As a condition of his release, the Court restricted Mr. Audisho's travel to within the Northern District of Illinois and Central District of California, requiring prior permission for any other travel outside the Northern District of Illinois. (Dkt #14, 15). Defendant was also required to surrender his U.S. passport to Pretrial Services. (*Id.*).

2. Defendant respectfully asks the Court to modify Mr. Audisho's bond conditions to permit him to travel to the Central District of Illinois in connection with his employment. Mr. Audisho currently works as the Public Health Director for a company involved in running Covid vaccination clinics. Several of these clinics are located in towns in the Central District of Illinois such as Kankakee, Peoria and Springfield. Mr. Audisho's employer would him to provide oversight of medical standards, training and operating procedures for these clinics. Providing this

oversight will require Mr. Audisho to travel to the Central District of Illinois approximately 2-4 times a month and will sometimes require him to stay overnight in these locations in order to complete all of his responsibilities at these clinics.

3. Defendant is in full compliance with his conditions of release and has had no issues during the pendency of his bond.

4. Undersigned counsel has discussed this request with Pretrial Services Officer Sam Schroeder, who stated Pretrial Services has no objection to this motion.

5. Undersigned counsel has also discussed this request with counsel for the government, who advised that the government does not object to this motion.

WHEREFORE, for the reasons set forth above, Defendant Sargon Audisho respectfully requests that the Court grant this Unopposed Motion to Modify Bond Conditions in order to permit Mr Audisho to travel to the Central District of Illinois in connection with his employment.

Dated: December 13, 2021

Respectfully submitted,

/s/ Eric S. Pruitt  
*Attorney for Defendant Sargon Audisho*

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